

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION

SERGIO TIJERINA-SALAZAR,)
Plaintiff,)
v.)
FERMIN VENEGAS, III, and,) No. 4:19-cv-00074-DC-DF
FERMIN VENEGAS SHEARING, INC.,)
Defendants.)

SETTLEMENT STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Sergio Tijerina-Salazar and Defendants Fermin Venegas Shearing, Inc. and Fermin Venegas, III, as follows:

1. The parties would announce to the Court that all claims, causes of action, and matters in controversy in this case have been settled and compromised.
2. The parties have reached a written agreement containing all material terms of the settlement and will be executing a more formal settlement agreement within the next 15 days.
3. The parties anticipate submitting dismissal documents to the Court within 30 days of this stipulation.
4. The parties respectfully request that the pre-trial hearing, trial setting, and all other deadlines in this case, be vacated.

Respectfully submitted and agreed:

**MOUNCE, GREEN, MYERS,
SAFI, PAXSON & GALATZAN
A Professional Corporation**
P. O. Box 1977
El Paso, Texas 79999-1977
(915) 532-2000
(915) 541-1597 Fax
koehler@mgmsg.com
mirazo@mgmsg.com
esparza@mgmsg.com

By: 

Bruce A. Koehler
State Bar No. 11649300
David M. Mirazo
State Bar No. 24044610
Michelle D. Esparza
State Bar No. 24116329

Attorneys for Defendants

 (with permission)

For Jerome Wesevich
jwesevich@trla.org
TEXAS RIOGRANDE LEGAL AID, INC.
1331 Texas Ave.
El Paso, Texas 79901
Tel (915) 585-5103
Fax (915) 533-8823

Christopher Willett
cwillett@equaljusticenter.org
EQUAL JUSTICE CENTER
510 Congress Ave., Ste. 206
Austin, Texas 78704
Tel (512) 474-0007, ext. 132
Fax (512) 474-0008

Gregory S. Schell, Esq.
Southern Migrant Legal Services
A Project of Texas/Rio Grande Legal Aid, Inc.

311 Plus Park Boulevard, Suite 135
Nashville, Tennessee 37217

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 13, 2022, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which electronically sent notification to all counsel of record.



Bruce A. Koehler